

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:

Chapter 11

WISCONSIN & MILWAUKEE HOTEL, LLC,

Case No. 24-21743

Debtor.

Honorable G. Michael Halfenger

**COMPUTERSHARE TRUST COMPANY, N.A. AND WISCONSIN & MILWAUKEE
HOTEL FUNDING LLC’S WITNESS LIST FOR HEARING BEGINNING
JULY 21, 2025, REGARDING CONFIRMATION OF DEBTOR’S PROPOSED
AMENDED CHAPTER 11 PLAN OF REORGANIZATION**

Computershare Trust Company, N.A. (“Computershare”) and Wisconsin & Milwaukee Hotel Funding LLC (“Funding” and together with Computershare, “Lenders”), by their attorneys, Reinhart Boerner Van Deuren s.c. (“Reinhart”), hereby designate the following witnesses for the hearing beginning July 21, 2025 (the “Hearing”) regarding confirmation of the *Amended Chapter 11 Plan of Reorganization of Wisconsin & Milwaukee Hotel LLC Dated April 4, 2025* [Dkt. 504] (the “Plan”):

1. Tanya J. Pierson, MAI (Expert).

Tanya J. Pierson is a Senior Managing Director of HVS Consulting & Valuation (“HVS”). HVS was retained by Reinhart to perform appraisals of the hotel and property that serves as Lenders’ collateral and is the Debtor’s primary asset in this bankruptcy case. Ms. Pierson will provide expert and opinion testimony regarding: (a) all matters discussed in the expert reports she prepared and submitted in connection with this case, any amendments or modifications thereto, and any related rebuttal reports and (b) her opinion regarding the value of the hotel. Generally speaking, Ms. Pierson will testify, among other things, that, (i) as of July 12, 2024, the value of the hotel was \$38,130,000 and the value of the related personal property

was \$1,070,000, for a total value of \$39,200,000, and (ii) as of April 29, 2025, the value of the hotel was \$36,370,000 and the value of the related personal property was \$530,000, for a total value of \$36,900,000. She will also testify as to her opinion of value following consideration of any amendment to the Plan, any Plan supplements, any expert reports submitted by the Debtor and any information disclosed by Debtor after the date hereof.

2. Cynthia Nelson (Expert).

Cynthia Nelson is a Senior Managing Director of FTI Consulting, Inc. (“FTI”). FTI was retained by Reinhart to provide financial advisory and consulting services to Lenders in connection with this bankruptcy case. Ms. Nelson will provide expert and opinion testimony concerning: (a) all matters discussed in the expert report she prepared and submitted in connection with this case, any amendments or modifications thereto, and any related rebuttal reports, (b) her opinions regarding the appropriate cramdown rate of interest applicable to deferred payments to be made on account of Computershare’s Class 1 Secured Claim and (c) the feasibility of the Plan. Generally speaking, Ms. Nelson will testify that the appropriate interest rate to be applied to payments of the Computershare claim is 12.59% or 12.84% (Prime Rate of 7.5% plus a risk factor of 5.09 to 5.34), depending on the Court’s determination of the value of the collateral, and that the Plan is not feasible. She will also testify as to her opinion of the appropriate interest rate to be applied and the feasibility of the Plan following consideration of any amendment to the Plan, any Plan supplements, any expert reports submitted by the Debtor and any information disclosed by Debtor after the date hereof.

3. Daniel Wycklendt.

Daniel Wycklendt is the Manager of FirstPathway Partners LLC, which is the Manager of Funding. Mr. Wycklendt will testify about: (a) all aspects of the debt owed by Debtor to

Lenders, (b) all aspects of the loan agreement, indenture, notes, mortgages and other loan documents related to the debt owed to Lenders and (c) Lenders' intentions if the Plan is not confirmed.

4. Scott Miswald.

Scott Miswald is the Chief Financial Officer of FirstPathway Partners LLC, which is the Manager of Funding. Mr. Miswald will testify about: (a) all aspects of the debt owed by Debtor to Lenders, (b) all aspects of the loan agreement, indenture, notes, mortgages and other loan documents related to the debt owed to Lenders and (c) Lenders' intentions if the Plan is not confirmed.

Lenders reserve the right to (a) call at the time of the Hearing any and all witnesses designated by any other parties-in-interest, (b) supplement this list in the event that additional witnesses become known or identified, or in the event any Plan amendments or supplements filed after the date hereof necessitate the calling of additional witnesses, and (c) call rebuttal and impeachment witnesses as necessary.

Dated this 6th day of June, 2025.

REINHART BOERNER VAN DEUREN s.c.

BY: /s/ Frank W. DiCatri

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